



**U.S. ENVIRONMENTAL PROTECTION AGENCY**  
REGION 8, MONTANA OFFICE  
FEDERAL BUILDING, 10 West 15<sup>th</sup> St., Suite 3200  
HELENA, MONTANA 59626

Ref: 8MO

May 24, 2007

Mr. Paul Bradford, Forest Supervisor  
Kootenai National Forest  
1101 U.S. Highway 2 West  
Libby, Montana 59923

Re: CEQ 20070178: Kootenai National Forest Invasive  
Plant Management Final Environmental Impact  
Statement and Record of Decision

Dear Mr. Bradford:

The Environmental Protection Agency (EPA) Region VIII Montana Office has reviewed the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the Kootenai National Forest Invasive Plant Management Project in accordance with its responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The EPA appreciates receipt of responses to agency DEIS comments in the FEIS. We recognize that noxious weeds are a great threat to biodiversity and can out-compete native plants and produce a monoculture that has little or no plant species diversity or benefit to wildlife. The EPA support's proposed improvements to the Kootenai National Forest's integrated weed management program to prevent the establishment and spread of noxious weeds, including use of aerial application of herbicides. We do, however, encourage prioritization of management techniques that focus on non-chemical weed control first, with reliance on chemicals being the last resort, since weed control chemicals can be toxic and have the potential to be transported to surface or ground water following application.

The Kootenai National Forest's proposed design criteria and mitigation measures for herbicide application appear to evidence good understanding of the need to avoid adverse health and environmental effects during herbicide applications. It is important that adequate mitigation measures be utilized during herbicide treatments to avoid transport of toxic chemicals to surface and ground waters and prevent adverse effects to fisheries, public health and the environment (e.g., measures such as adequate streamside buffers, mechanical weed removal in sensitive areas, flagging sensitive areas on the ground, spray nozzles that produce larger droplets to reduce drift, calibration of spray equipment, certification and training of personnel, use of GPS technology or ground radio contact with pilots, use of spray detection cards, use of photodegradable dyes in herbicides, wind monitoring, herbicide monitoring, etc.,).



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We also support monitoring and adaptive management before and after weed treatments to assure identification and mitigation of environmental effects, and to validate that herbicide application protocols and design criteria are effective in preventing herbicide transport to surface and ground waters. We are pleased that efforts will be made to help ensure the accuracy and safety of aerial pesticide applications, and that the Monitoring Plan in Appendix I indicates that some water samples will be collected before and after herbicide treatments to determine if design criteria and mitigation measures are successful in avoiding herbicide transport to surface or ground waters (i.e., five sites will be monitored for herbicide transport to surface or ground waters; one site from the aerial application program with the highest potential for herbicide transport to surface water; two sites monitored from the ground based road herbicide application program; and two wells monitored for ground water contamination; with water samples tested for picloram, clopyralid, and hexachlorobenzene). Such monitoring should also help to improve public confidence that chemical contamination of surface waters does not occur.

We appreciate the opportunity to review the proposed project and participate during the NEPA process. If you have any questions regarding EPA input please contact Mr. Steve Potts of my staff in Helena at 406-457-5022 or in Missoula at 406-329-3313 or via e-mail at [potts.stephen@epa.gov](mailto:potts.stephen@epa.gov). Thank you for your consideration.

Sincerely,

/s/

John F. Wardell  
Director  
Montana Office

cc: Larry Svoboda/Julia Johnson, EPA, 8EPR-N, Denver  
Dan Leavell, Kootenai National Forest, Libby